

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

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**ABDULSALAM ALI ABDUL-  
RAHMAN AL-HELA, et al.,**

*Petitioner-Appellants,*

*v.*

**DONALD J. TRUMP, et al.,**

*Respondents-Appellees.*

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**Case No. 19-5079**

**APPELLANT’S CONSENT MOTION TO EXTEND TIME  
TO FILE A PETITION FOR REHEARING**

A panel of this Court issued an opinion in this case on August 28, 2020. *See Al Hela v. Trump*, No. 19-5079, \_\_\_ F.3d \_\_\_, 2020 WL 5083438 (D.C. Cir. Aug. 28, 2020). As provided in Rules 35(c) and 40(a)(1) of the Federal Rules of Appellate Procedure, a petition for rehearing is currently due on October 12, 2020. Pursuant to Circuit Rule 35(a), Appellant Abdulsalam Ali Abdulrahman Al Hela respectfully requests that the deadline for filing a petition for rehearing be extended by 14 days, from October 12, 2020 to October 26, 2020. Counsel for the government consent to this request.

We intend to file a petition for rehearing en banc in this matter. Good cause exists for the requested extension: access to offices of undersigned counsel remain

limited due to the COVID-19 pandemic; attorney access to classified material relevant to this matter is rendered more difficult by the COVID-19 pandemic; and attorneys may only discuss classified material in person, which is also more difficult because of the pandemic. Moreover, written communications between counsel and petitioner are transmitted only every other week, and visits to the petitioner at Naval Station Guantanamo Bay are impractical because of the pandemic. (When it issued its opinion, the Court *sua sponte* stayed the issuance of the mandate through the disposition of any petition for rehearing. *See* Order, Doc. No. 1858801 (August 28, 2020).)

Accordingly, Appellant Al Hela respectfully requests that his deadline to file a petition for rehearing in this case be extended by 14 days, from October 12, 2020 to October 26, 2020.

Respectfully submitted,

/s/ Andrew D. Garrahan  
S. William Livingston  
D.C. Bar No. 59055  
Alan A. Pemberton  
D.C. Bar No. 367108  
Andrew D. Garrahan  
D.C. Bar No. 1017643  
COVINGTON & BURLING LLP  
One CityCenter  
850 Tenth Street NW  
Washington, DC 20001

(202) 662-6000 (phone)

(202) 662-6291 (fax)

wlivingston@cov.com

apemberton@cov.com

agarrahan@cov.com

September 11, 2020

**CERTIFICATE OF SERVICE**

I, Andrew D. Garrahan, hereby certify that on this 11th Day of September, 2020, I caused a true and correct copy of the foregoing Consent Motion to Extend Time to File a Petition for Rehearing to be served electronically by the ECF system upon the following counsel of record:

Brad Hinshelwood  
Attorney, Appellate Staff  
Civil Division  
U.S. Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530  
(202) 514-7823  
bradley.a.hinshelwood@usdoj.gov

Sharon Swingle  
Attorney, Appellate Staff  
Civil Division  
U.S. Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530  
(202) 514-2000  
Sharon.Swingle@usdoj.gov

/s/ Andrew D. Garrahan  
Andrew D. Garrahan  
Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001  
(202) 662-6000 (phone)  
(202) 662-6291 (fax)  
agarrahan@cov.com

**CERTIFICATE OF COMPLIANCE**

I, Andrew D. Garrahan, hereby certify that the foregoing motion complies with the word limitation of Fed. R. App. P. 27(d)(2)(A) and contains 260 words, excluding the portions of the motion excluded by Fed. R. App. P. 32(f).

/s/ Andrew D. Garrahan  
Andrew D. Garrahan